

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking Regarding
Policies, Procedures and Rules for the
California Solar Initiative, the Self-Generation
Incentive Program and Other Distributed
Generation Issues.

Rulemaking 06-03-004
(Filed March 2, 2006)

**REPLY COMMENTS OF FAT SPANIEL TECHNOLOGIES, INC. TO
COMMENTS ON PHASE 1 STAFF PROPOSAL TO IMPLEMENT THE CALIFORNIA
SOLAR INITIATIVE**

May 26, 2006

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INTRODUCTION AND SUMMARY

Fat Spaniel Technologies, Inc. ("FST") provides independent metering and data monitoring solutions specifically designed for reporting, verifying, and auditing the performance of solar, wind, fuel cell, and other distributed generation installations. FST has been policy neutral in regard to incentive structures under debate in this proceeding. FST's interest is in accurate measurement and reporting of electricity generation from new solar systems installed as pursuant to the California Solar Initiative ("CSI") program.

With this goal in mind, FST's reply comments are focused on making sure metering requirements of the CSI Program are:

- Clearly defined;
- Encourage innovation and cost reduction in remote metering and monitoring; and
- Drive significant additional benefits throughout the value chain.

I. REAL TIME COMMUNICATIONS

FST respectfully disagrees with the position of Southern California Edison (“SCE”) that web-based reporting and internet communication features should be purely optional. It is important that high quality data be reported in real or near-real time to the many interested parties to an installation (e.g. owners, installers, original equipment manufacturers) who are in a position to act on the information.

FST agrees with the comments of San Diego Gas & Electric Company (“SDG&E”) and Southern California Gas Company (“SoCalGas”) that PV System owners who receive information regarding PV systems performance will do a better job of maintaining the PV system and thereby increase the productivity of CSI program funding. Moreover, making real time output and performance data available to system installers, inverter companies, PV panel companies and other parties with experience in these systems would tend to optimize system performance not only because of their superior knowledge, but because these parties have vested interests in keeping systems operating at peak performance, improving their products and services, and reducing costs of solar PV. Finally, requiring remote metering, monitoring, and web-based reporting on all funded systems as soon as practical would also reduce the cost of collection and delivery of data, which would make administration of the CSI program more cost effective.

II. UTILITY CONTROL OF METERING & THIRD PARTY METERING

FST respectfully acknowledges SCE’s comments advocating each utility’s determination of the “best-fit meter for its service territory”. However, other parties have important vested interests in seamless access to revenue quality meter data. Some of these parties may even desire more advanced metering than a “best-fit” meter or inverter meter might provide. Accordingly, irrespective of whether the CPUC grants utilities choices in selecting meters, it should

specifically grant to appropriate parties (1) real-time access to all available meter readings provided by these best-fit meters (via ModBus or other advanced communication protocols), (2) the ability to request reasonable programming of various meter parameters, and (3) the ability to upgrade the best-fit meter to a more advanced model that services their needs as well as those of the utility.

Additionally, should utilities be allowed to choose their meters, FST sees an even stronger need for an industry working group to convene to enable third-party monitoring and metering companies to at a minimum (1) work closely with the California utilities to develop standards and procedures by which utilities can provide data access to on-site utility meters (as is currently the case for large C&I customers with energy management systems) and (2) develop industry standards with respect to data transfer format.

While not specifically commenting on the issues just noted by FST, SDG&E and SoCalGas do acknowledge the viability of a third-party entity to provide, maintain, and operate meters. SDG&E and SoCalGas also mention Rule 25 as an appropriate starting point for discussion of third party metering requirements. FST supports these comments, agrees that Rule 25 is an appropriate starting point for discussion, and looks forward to working with SDG&E and SoCalGas and the rest of the IOUs in the development effort of specific standards for third-party metering and meter access tailored to the CSI program.

DATED: May 26, 2006.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, Elizabeth York Hecox, hereby certify that I have this day served a copy of REPLY
COMMENTS OF FAT SPANIEL TECHNOLOGIES, INC. TO COMMENTS ON PHASE 1
STAFF PROPOSAL TO IMPLEMENT THE CALIFORNIA SOLAR INITIATIVE on all
known parties to proceeding number, R.06-03-004 by mailing a properly addressed copy by first-
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And transmitting an e-mail message with the document attached to all other parties named in the
official service list.

Executed on May 26, 2006 at Sacramento, California.


Elizabeth York Hecox